JOINT DECLARATION OF SHERRY LICHTENBERG AND JOHN SIVORI

ATTACHMENT 10

SWBT

Competitive Local Exchange Carrier (CLEC)

Interface

Change Management

Process

Interface Change Management Process: SWBT and Competitive Local Exchange Carrier (CLEC)

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1.0 Purpose

This documents the Change Management Process ("CMP") by which Southwestern Bell Telephone Company (herein after referred to as "SWBT",) will notify Competitive Local Exchange Carriers (CLECs) of changes to the Operational Support Systems ("OSS") interfaces, introduction of new interfaces and retirement of interfaces detailed below and provides for the identification and resolution of CLEC issues associated with the CMP. The parties intend for the CMP to be dynamic in nature, managed through regularly scheduled meetings (at a minimum of once a quarter) and based on group consensus. Any agreed-upon modifications to the process will be included in this document.

2.0 Scope

This process pertains to all ordering, pre-ordering, and provisioning and maintenance electronic interfaces, specific to end-user ordering only, including, but not limited to, SWBT's Application to Application Interfaces and Graphical User Interfaces ("GUI"), as listed in Appendix A of this document. Notwithstanding the foregoing, this process does not pertain to Electronic Bonding Interfaces ("EBI"). The parties may discuss expansion of this process to billing processes, and non-end user ordering functions during the scheduled meetings, and will later address manual processes.

This document applies to SWBT and all CLECs operating in Arkansas, Kansas, Missouri, Oklahoma, and Texas.

3.0 Changes to Existing Interfaces

3.1 Types of Changes To Existing Interfaces

The CMP manages changes to OSS interfaces that affect CLECs' production or test environments. Such changes may encompass:

3.1.1 Operations changes to existing functionality that impact the CLEC interface(s) upon SWBT's release date for new interface software. For example:

- adding/deleting/modifying fields required to access a function
- changing the flow, or sequence, of interface operation
- adding an edit to ensure a required field is entered

3.1.2 Technology changes that require CLECs to meet new technical requirements upon SWBT's release date. For example:

- eliminating a previously supported operating system software (e.g., Microsoft™ Windows™ 3.0), hardware or protocol

- requiring a new software, hardware (e.g., 8Mb RAM), or protocol

3.1.3 Additional functionality changes that may be used at the CLEC's option, on or after SWBT's release date for new interface software. For example:

- adding a new field to access a new function, without other impacts
- allowance for additional entries into existing fields
- adding a new supported software, hardware or protocol

3.1.4 Regulatory Mandates

- Those changes that may be mandated by regulatory bodies, as discussed in Section 6.2.4 of this document.

3.2 Two Categories of Changes To Existing Interfaces

This process divides changes into two categories:

- Category One (Gateway) changes include changes to gateway applications, such as Electronic Data Interchange ("EDI") Ordering, EDI/Common Object Request Broker Architecture ("CORBA") and DataGate Pre-Ordering).

- Category Two (GUI) is solely for changes to GUIs where the change is specific to a GUI (e.g., enhancements to the print capability in the Local Service Request (LSR) EXchange system (LEX)).

3.3 Category One (Gateway) Change Process (Appendix B)

3.3.1 For Gateway interfaces based on industry guidelines, the parties presume that the guidelines developed at the industry forums i.e., Alliance for Telecommunications Industry Solutions ("ATIS"), Ordering and Billing Forum ("OBF") will be the basis for managing change. SWBT anticipates using applicable OBF Guidelines; however the needs and constraints of SWBT's legacy systems may limit use of all such Guidelines; SWBT will identify any proposed variances from OBF Guidelines.[1] Therefore, as the industry guideline e.g., Local Service Ordering Guidelines ("LSOG") requirements are being determined at OBF, SWBT will review the requirements to determine compatibility with SWBT's systems. There may be other changes initiated by SWBT to gateway interfaces that are not a result of ATIS/OBF change drivers (e.g., changes to enhance order flow- through). SWBT will also consider changes recommended by CLECs through the Change Request process (see Section 8.1).

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[1] This is in accordance with General Section 1.0, paragraph 1.4 of the practices in the OBF Local Service Ordering Guidelines (LSOG), which states that "Options described in this practice may not be applicable to individual provider's tariffs; therefore, use of either the field or valid entries within the field is based on the provider's tariffs/practices".

3.3.2 Regardless of the change driver, SWBT will prepare a preliminary package of the required issue changes and share these plans at a scheduled Change Management meeting nine (9) to twelve (12) months in advance of the target implementation date. SWBT will share its plans as part of its 12-Month Development View (see Managing the CMP, Section 8).

3.3.3 SWBT will provide a **Release Announcement** delivered to CLECs via an email Accessible Letter. The letter will contain a written summary of the change(s) in plain English, a target timeframe for implementation, any cross reference to industry documentation, and any known exceptions to industry guidelines.

3.3.4 If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax or regular mail) to its SWBT Account Manager. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations for implementation. The CLEC response must be received by the SWBT Account Manager in writing no later than the 7th calendar day following the date of the Release Announcement.[2]

3.3.5 SWBT will review all CLEC responses.

3.3.6 Within 7 calendar days of the end of the time period specified in Step 3.3.4 (14th calendar day following the date of the Release Announcement), SWBT will provide written answers to CLEC questions via Accessible Letter. SWBT's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC.

3.3.7 If SWBT announces any changes before applicable guidelines are finalized at the ATIS/OBF industry forums, SWBT will review the final guidelines when they are issued for any alterations that may be necessary for compliance with the finalized requirements.

3.3.8 No sooner than the last day of the period specified in Step 3.3.6, SWBT will send the **Initial Release Requirements** to CLECs via another email Accessible Letter. The Initial Release Requirements will contain the planned implementation date, Index of Changes, updated interface requirements (e.g., Local Service Ordering Requirements (LSOR) changes), exceptions to transactions sets or data models, industry cross reference, reporting impacts, (if any) and timeframes for CLEC joint testing. In setting the timeframes for CLEC joint testing, SWBT will consider the scope of the release and potential impact on CLEC development efforts. Generally, SWBT's planned implementation will fall

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[2] In all cases, the date of any Accessible Letter referenced in this Agreement will be the date on which SWBT emails the document to CLECs. Provided, however, that any Accessible Letter transmitted by e-mail after 4:00 PM Central Time shall be considered as transmitted the next business day. SWBT will send the Accessible Letters to the point(s) of contact designated by the CLEC. It is each CLEC's responsibility to ensure that SBC has a current contact list.

within 152 to 172 calendar days from the date of the Initial Release Requirements.

3.3.9 If a CLEC identifies issues or requires clarification (including issues with the planned implementation timeline and testing windows), the CLEC must send a written response (via email, fax or regular mail) to its SWBT Account Manager, which must be received not later than the 21st calendar day after the date of the Initial Release Requirements.

3.3.10 SWBT will review all CLEC responses to the Initial Release Requirements.

3.3.11 Not later than the 21st calendar day following the end of the period specified in Step 3.3.9, SWBT will provide written answers to CLEC questions via an email Accessible Letter. SWBT's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the answers will be distributed to all CLECs in the same Accessible Letter. This Accessible Letter will constitute the **Final Release Requirements**, which will include a summary of changes from Step 3.3.8 above (Index of Changes), implementation date of the new version, the sunset date of the old version and reference to SWBT's CLEC web site location where the detailed Final Release Requirements are stored. Generally, SWBT's planned implementation will fall within 110 to 130 calendar days from the date of the Final Release Requirements.

3.3.12 Should a CLEC elect to initiate the **Outstanding Issue Solution (OIS)** process described in this CMP **related to the Final Release Requirements** for Category One Changes, the CLEC must send a written notice (via email, fax or regular mail) to its SWBT Account Manager, which must be received within 7 calendar days from the date of the Final Release Requirements.

3.3.13 Upon receipt of a CLEC OIS notice relating to such Final Release Requirements, SWBT will schedule an OIS conference call for 2:00 PM Central Time, 7 calendar days after the due date for the OIS notices (14 calendar days after the date of the Final Release Requirements). Additional procedures for an OIS related to such Final Release Requirements are as specified in the Section 7 of this document.

3.3.14 If no Final Release Requirements OIS is initiated (or after successful conclusion of any such OIS), testing will be conducted by SWBT and any interested CLEC until the agreed upon testing exit criteria have been satisfied, in accordance with a negotiated joint test plan, to the mutual satisfaction of the parties.

    a) SWBT will make testing available in accordance with the timeframes specified in the Final Release Requirements. The available testing timeframe shall be no less than 30 calendar days.

b) For LEX LSR changes, SWBT will provide CLECs access to the test environment in accordance with the timeframes specified in the Final Release Requirements. The available testing timeframe shall be no less than 30 calendar days.

c) Testing must be scheduled to end at least 7 calendar days prior to the scheduled implementation date, unless otherwise agreed between SWBT and the CLEC.

3.3.15 If the parties cannot agree on whether the test criteria have been satisfied within the planned timeframe, either SWBT or the CLEC may invoke a second **OIS process related to Gateway Implementation**, using the eligibility requirements and timeline defined in Section 7 of this document.

3.3.16 If no Gateway Implementation OIS is initiated after the completion of joint testing (or after successful conclusion of any such OIS), SWBT will implement the new release or updates.

3.4 Versioning of Gateway Releases

3.4.1 SWBT will support two versions of software for its EDI Ordering and EDI/CORBA Pre-Ordering interfaces. Those versions will be the current and previous versions, whether the previous is a basic EDI/LSOG version or a SWBT upgraded EDI/LSOG version (a dot release). SWBT will version the latest two releases beginning with the first release in 2000.

3.4.2 Specifically, if the current LSOG version is considered LSOGA, then the first release in 2000 would be LSOGB. SWBT will continue to make LSOGA available for use along with LSOGB. If the next release is LSOGB.1, at release time, SWBT would sunset LSOGA and will maintain LSOGB and LSOGB.1. Thus, two consecutive versions of software (including dot releases) for SWBT's EDI Ordering and EDI/CORBA Pre-Ordering interfaces would be up and running at all times. SWBT's Release Announcement of a new version will constitute notification of sunset for the oldest version.

3.4.3 Upon implementation of the release, SWBT will no longer support the oldest version. SWBT will maintain two versions, as described above, even if such versioning departs from final guidelines adopted by OBF.

3.4.4 SWBT's DataGate Pre-Ordering interface utilizes similar versioning techniques. SWBT will support two versions of software, the current version and the immediate past version. SWBT will version the latest two releases beginning with the first release of 2000. SWBT's release announcement of a new version will constitute notification of sunset for the oldest version. Upon implementation of the release, SWBT will no longer support the oldest version.

3.5 Category Two (GUI) Change Process (Appendix C)

3.5.1 SWBT will share plans for changes to GUI at scheduled Change Management meetings, as part of its rolling 12-month Development View (see Managing the CMP, Section 8). SWBT makes available one version of a GUI at any given time.

3.5.2 At least 21 days prior to its planned implementation date, SWBT will detail the changes in an **Initial Requirements Release** delivered to CLECs via an email Accessible Letter. The letter will contain a written summary of the change(s) in plain English, a target timeframe for implementation, and any cross-reference to updated User Guide or revised User Guide pages. LEX changes associated with the LSR will be handled on a timeline to allow for the 30 day test window discussed in 3.3.14b above.

3.5.3 If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax or regular mail) to its SWBT Account Manager. The CLEC response must be received by SWBT within 4 business days of the date of the Initial Release Requirements. The response will specify the CLEC's questions, issues and any alternative recommendations for implementation.

3.5.4 SWBT will review all CLEC responses.

3.5.5 Within three business days of the end of the period specified in Step 3.5.3, SWBT will provide written answers to CLEC questions via email Accessible Letter. SWBT's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the responses will be distributed to all CLECs in the same Accessible Letter. This will constitute the **Final Release Requirements** which will include a summary of changes from Step 3.5.2 above, indication of type of change (i.e., documentation change, business rule change, clarification change), changed requirements pages, and release date. Generally, SWBT's planned implementation date will be no sooner than the 14th calendar day from the date of the Final Release Requirements.

3.5.6 Should a CLEC elect to initiate the **OIS process related to Final Release Requirements** for Category Two (GUI) Changes, the CLEC must send a written notice (via email, fax, or regular mail) to its SWBT Account Manager, which must be received within two business days of the date of the Final Release Requirements.

3.5.7 Upon receipt of an OIS notice related to such Final Release Requirements, SWBT will schedule a conference call to be held at 2:00 PM Central Time, two business days after the due date for OIS initiation notices (four business days after the Final Release Requirements). Additional procedures for an OIS related to Final Release Requirements are specified in Section7 of this document.

3.5.8 No provision for CLEC joint testing is included in the Category Two process, with the exception of LEX, referred to in Section 3.3.14b.

3.5.9 If there is no Final Release Requirements OIS for GUI changes (or after successful resolution of such an OIS), SWBT will implement the new release or updates.

3.5.10 There is no OIS process for SWBT's retail systems.

4.0 Introduction of New Interfaces

4.1 Two Categories of New Interfaces

This process divides the introduction of new interfaces into two categories: Category One (Gateway) and Category Two (GUI).

4.2 Category One (Gateway) Process-New Interface (Appendix D)

4.2.1 Approximately nine (9) months in advance of the target implementation date, SWBT will convene a Design and Development meeting with the CLEC community. SWBT will share preliminary plans for the new interface, including regional availability, proposed implementation timeline, SWBT constraints and exceptions to industry standards, etc. During the Design and Development meeting, CLECs may provide feedback to SWBT, including interest in developing to the initial version of the interface. If available, SWBT will share draft Initial Release Requirements.

4.2.2 If a CLEC identifies additional issues or wishes to provide feedback, the CLEC must send a written response (via email, fax or regular mail) to its SWBT Account Manager which must be received no later than the 4th business day following the date of the Design and Development Meeting. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations for implementation.

4.2.3 SWBT will communicate via Accessible Letter its interface development plans, including how it has incorporated CLEC feedback from the Design and Development Meeting and additional written feedback (this can be combined with Step 4.2.4).

4.2.4 SWBT will provide a **Release Announcement** to CLECs via an email Accessible Letter. The letter will contain a written summary of the new interface in plain English, a target timeframe for implementation, any cross reference to industry documentation and any known exceptions to industry guidelines.

4.2.5 If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax or regular mail) to its SWBT Account Manager, which must be received no later than the 7th calendar day following the date of the Release Announcement. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations for implementation.

4.2.6 CLECs who are interested in developing to the initial version of the interface (as described in the Release Announcement) within six months of

SWBT's planned implementation, will document that intent via one of the following methods:

- a Record of Understanding ("ROU"),

- a signed ICA with an implementation schedule for the interface,

- negotiating terms and conditions for access to the interface, subject to acceptable substantiation and sanctioned by a majority vote of the other qualified CLECs.

ROUs can be modified or submitted through Step 4.2.13 of the process.

4.2.7 SWBT will review all CLEC responses.

4.2.8 Within 7 calendar days of the end of the time period specified in Step 4.2.5 (14 calendar days following the date of the Release Announcement), SWBT will provide written answers to CLEC questions via Accessible Letter. SWBT's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC.

4.2.9 If SWBT announces a new interface before applicable guidelines are finalized at the ATIS/OBF industry forums, SWBT will review the final guidelines when they are issued for any alterations that may be necessary for compliance with the finalized requirements. SWBT will consider its system requirements and provide known exceptions to industry guidelines.

4.2.10 No sooner than the last day of the period specified in Step 4.2.8, SWBT will send the **Initial Release Requirements** to CLECs via another Accessible Letter. The Initial Release Requirements will contain the planned implementation date, interface requirements, exceptions to the EDI transaction set (if applicable), industry cross-reference and reporting impacts, if any. Generally, SWBT's planned implementation will fall within 152 to 172 calendar days from the date of the Initial Release Requirements.

4.2.11 If a CLEC identifies issues or requires clarification (including issues with the planned implementation date), the CLEC must send a written response (via email, fax or regular mail) to its SWBT Account Manager which must be received no later than the 21st calendar day after the date of the Initial Release Requirements.

4.2.12 SWBT will review all CLEC responses to Initial Release Requirements.

4.2.13 Not later than the 21st calendar day following the end of the period specified in Step 4.2.11, SWBT will provide written answers to CLEC questions via an email Accessible Letter. SWBT's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the answers will be distributed to all CLECs in the same Accessible Letter. This Accessible Letter will constitute the **Final Release Requirements** which will include a summary of the changes from Step 4.2.12 above, indication of type of change, (i.e., documentation change,

business rule change, clarification change, etc.), changed requirements pages and Release date. Generally, SWBT's planned implementation will fall within 110 to 130 calendar days from the date of the Final Release Requirements.

4.2.14 Should a CLEC elect to initiate the **OIS process related to the Final Release Requirements** for a New Category One (Gateway) Interface, the CLEC must send a written notice (via email, fax or regular mail) to its SWBT Account Manager which must be received within 7 calendar days from the date of the Final Release Requirements.

4.2.15 Upon receipt of a CLEC OIS notice related to such Final Release Requirements, SWBT will schedule an OIS conference call for 2:00 PM Central Time, 7 calendar days after the due date for the OIS notices (14 calendar days after the date of the Final Release Requirements). Additional procedures for an OIS related to such Final Release Requirements are as specified in Section 7 of this document.

4.2.16 If no Final Release Requirements OIS for a new Gateway Interface is initiated (or after successful conclusion of any OIS), testing will be conducted by SWBT and any interested CLEC, until the agreed upon testing exit criteria have been satisfied in accordance with a negotiated joint release test plan, to the mutual satisfaction of the parties.

a) SWBT will make testing available in accordance with the timeframes specified in the Final Release Requirements. The available testing timeframe shall be no less than 30 calendar days.

b) Testing must be scheduled to end at least 7 calendar days prior to the scheduled implementation date, unless otherwise agreed between SWBT and a CLEC.

4.2.17 If the parties cannot agree on whether the test criteria have been satisfied within the planned timeframe, either SWBT or the CLEC may invoke a second **OIS process related to New Interface Gateway Implementation**, using the eligibility requirements and timeline defined in the Section 7 of this document.

4.2.18 If no Gateway Implementation OIS is initiated after the completion of joint testing (or after successful completion of any OIS), SWBT will implement the new interface.

4.3 Category Two (GUI) Process- New interface (Appendix E)

4.3.1 Approximately eight weeks in advance of the target implementation date, SWBT will share Design and Development information with the CLEC community (e.g., via a meeting, conference call or email Accessible Letter, etc.). SWBT will share preliminary plans for the new interface, including regional availability, proposed implementation timeline, SWBT's constraints and exceptions to industry standards, etc. CLECs will provide feedback to SWBT, including

interest in implementing the initial version of the interface. If available, SWBT will share draft Initial Release Requirements.

4.3.2 If a CLEC identifies additional issues or feedback, the CLEC must send a written response (via email, fax or regular mail) to its SWBT Account Manager which must be received no later than the 2nd business day following the date the Design and Development information is provided. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations for implementation.

4.3.3 SWBT will communicate its interface development plans via Accessible Letter, including how it has incorporated CLEC feedback from the meeting and additional written feedback (this can be combined with Step 4.3.4).

4.3.4 SWBT will detail the new interface in **Initial Release Requirements** delivered to CLECs via an email Accessible Letter. The letter will contain a written summary of the new interface in plain English, a target timeframe for implementation, how and when the User Guide will be available and user training requirements.

4.3.5 If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax, or regular mail) to its SWBT Account Manager, which must be received no later than the 4th business day after the date of the Initial Release Requirements. . The response will specify the CLEC's questions, issues and any alternative recommendations for implementation.

4.3.6 SWBT will review all CLEC responses.

4.3.7 No later than the 3rd business day after the end of the period specified in Step 4.3.5, SWBT will provide written answers to CLEC questions via email Accessible Letter. SWBT's answers will be shared with all CLECs unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the answers will be distributed to all CLECs in the same Accessible Letter. This will constitute the **Final Release Requirements** which will include a summary of the changes from Step 4.3.4 above, indication of type of change, (i.e., documentation change, business rule change, clarification change, etc.), changed requirements pages and release date. Generally, SWBT's planned implementation will be no sooner than the 14th calendar day from the date of the Final Release Requirements.

4.3.8 Should a CLEC elect to initiate the **OIS process** described in this CMP **related to the Final Release Requirements** for a New Category Two Interface, the CLEC must send a written notice (via email, fax or regular mail) to its SWBT Account Manager, which must be received within two business days of the date of the Final Release Requirements.

4.3.9 Upon receipt of a CLEC OIS notice related to a Final Release Requirements, SWBT will schedule an OIS conference call for 2:00 PM Central Time, two business days after the due date for the OIS notices (four business days after the date of the Final Release Requirements). Additional proceedings

for an OIS related to Final Release Requirements are as specified in the Section 7 of this document.

4.3.10 The OIS process is not available for SWBT's retail systems, as specified in the Section 7 of this document.

4.3.11 CLECs may negotiate through their SWBT Account Manager the ability to pass a limited number of test transactions. This would only be available after the interface is in a production mode and at the CLEC's initial turn up of the interface.

4.3.12 If no Final Release Requirements OIS is initiated (or after successful conclusion of any OIS), SWBT will implement the new interface.

5.0 Retirement of Existing Interfaces

5.1 Retirement Groups

This process divides the retirement of all interfaces in the scope of this document into two groups:

- Group A: retail interfaces (see Appendix A)

- Group B: wholesale interfaces (see Appendix A)

    - Category 1: Gateway applications

    - Category 2: GUI applications

5.2 Interface Retirement Process (Appendix F)

5.2.1 Prior to sending a Retirement Notice, **SWBT will share its initial plans** for retirement of existing interfaces at a scheduled CMP meeting. During that scheduled meeting, SWBT will explain the rationale for retiring the interface, where the replacement functionality resides or where it will exist in production at least six months prior to the scheduled retirement date, its plans to maintain the interface for a specified period of time, and its target date for the Retirement Notice.

5.2.2 SWBT will announce the retirement of the interface in a **Retirement Notice** delivered to CLECs via an email Accessible Letter. The letter will contain a written summary of the retirement plans in plain English and a retirement date. The letter will also specify the interfaces where comparable functionality currently exists or will exist in production at least six months prior to the scheduled retirement date. Once an interface with comparable functionality is in production, no CLEC may begin to use (i.e., "turn up" for the first time) the interface that is scheduled for retirement. For retirement of interfaces, SWBT will provide the following notice (broken out by Interface Group) from the time of the Retirement

Notice to the retirement of the interface, unless SWBT invokes the use of the Exception process, as described in Section 6.2.

- Group A: 12 months
- Group B:
    - Category 1: 24 months
    - Category 2: 12 months

5.2.3 If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax or regular mail) to its SWBT Account Manager, which must be received no later than the 21st calendar day following the date of the Retirement Notice. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations.

5.2.4 SWBT will review all CLEC responses.

5.2.5 Not later than the 21st calendar day following the end of the period specified in Step 5.2.3, SWBT will provide written answers to CLEC questions via an email Accessible Letter. SWBT's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the answers will be distributed to all CLECs in the same Accessible Letter. This will constitute the **Final Retirement Notice**, which will include the retirement date and any changes in Step 5.2.2 above.

5.2.6 With respect to retirement of Group B, a CLEC may elect to use the **OIS process**. Should a CLEC elect to initiate the process described in Section 7, the CLEC must send a written notice (via email, fax or regular mail) to its SWBT Account Manager, which must be received at least 30 calendar days prior to the scheduled retirement date

5.2.7 Upon receipt of a CLEC OIS notice, SWBT will schedule an OIS conference call for 2:00 PM Central Time, 7 calendar days after the due date of the OIS notices.

5.2.8 If no OIS is initiated, (or after successful conclusion of any OIS), SWBT will retire the interface on the retirement date announced.

6.0 Other Items

6.1 Emergency Situations

6.1.1 Emergency releases or emergency implementation date changes will be handled as special cases.

6.1.2 Emergency releases are releases that address major software problems, production system failure or an interface failure. These also include releases

that address significant production problems, the failure of scheduled release enhancements and the failure of pre-existing functionality.

6.1.3 The notification process interval will be handled on a case-by-case basis and will depend on the type and extent of the emergency. Notification to the CLECs will be sent as soon as reasonably practicable after the emergency is recognized. The emergency notification need not be in the form of an Accessible Letter, and may be sent via other expedited means (e.g., broadcast fax).

6.1.4 In emergency situations, mutual testing and problem resolution will be conducted through the OSS contacts for all companies involved. Disagreements regarding the existence of an emergency situation shall be resolved through escalation and may be brought before the appropriate regulatory body.

6.2 Exceptions

6.2.1 Above and beyond the need to handle emergency situations, the parties recognize the need to occasionally allow for other exceptions to the CMP described herein. However, because it will be difficult for SWBT or other CLECs to accurately assess the impact of SWBT's proposed change on any given CLEC's current or future development, any agreement to deviate from the normal CMP shall be agreed to unanimously by qualified CLECs and SWBT. If SWBT wishes to propose that a specified change, introduction of a new interface or retirement of an interface be handled on an exception basis, it will issue a Release (or Retirement) Requirements Exception Accessible Letter, which indicates that it seeks an exception following the conclusion of a reply and comment cycle.

6.2.2 In CLEC responses, due within the applicable timeframe documented in the process, CLECs will raise questions and issues. Qualified CLECs [3] will indicate objections to handling the change, new interface or retirement as an exception. Lack of a response indicates no objection.

6.2.3 SWBT may proceed to implement the change, new interface or retirement on an exception basis only if there are no outstanding issues, or CLEC objections at the end of the CLEC response cycle specified in Step 6.2.2 above.

6.2.4 Regulatory mandated changes, whereby a regulatory body specifically orders expanded or modified functionality within the mandated timeframes, will not be subject to the objection process for exceptions. In the Accessible Letter notification, SWBT will provide any modified timelines for the change. If no such timeframe is specified, regulatory mandated change shall be subject to the CMP process as described in this document.

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[3] The definition of "qualified" CLECs is the same as is specified in the OIS section of the document.

6.3 Training

All changes to existing interfaces, as well as the introduction of new interfaces, will be incorporated into external CLEC training and SWBT's internal processes for updating employees on changes to CLEC and its own retail systems. This includes updating external CLEC training, and all parties' best efforts to update internal training and applicable Methods and Procedures (M&P).

All parties agree that information regarding changes to the interfaces, as well as information regarding new interfaces, needs to be communicated and coordinated with end users and support personnel to ensure effective implementation.

6.4 CLEC Joint Testing

6.4.1 Existing Interfaces

For changes to existing interfaces, CLEC joint testing will be conducted for gateway interfaces and LEX.

Where applicable, SWBT and CLECs will perform gateway interface testing as negotiated by the parties and documented in a customized test plan. SWBT maintains a Joint Release Test Plan template on its CLEC web site that may be used in the development of the customized test plan. Each testing party will meet with SWBT and agree on its own set of test scenarios that will be included in the test, applicable entrance and exit criteria and a test schedule. Regression testing will be supported in limited scenarios as agreed upon in the documented test plan. Should the parties not agree that a successful test was achieved within the specified interval, either SWBT or the CLEC may initiate an OIS, as described in Section 7.

If an OIS call is requested based on the results of joint CLEC testing, the call will be held the Tuesday prior to the scheduled release. An eligible CLEC must notify its SWBT Account Manager in writing by 12:00 PM Central on the Monday prior to the scheduled release implementation.

6.4.2 New Interfaces

For new interfaces, CLEC joint testing will be conducted for gateway interfaces. For GUIs, CLECs may negotiate through their SWBT Account Manager the ability to pass a limited number of test transactions, over the GUI interface, after the interface is in production mode.

If an OIS call is requested based on the results of joint CLEC testing, the call will be held the Tuesday prior to the scheduled release. An eligible CLEC must

notify its SWBT Account Manager in writing by 12:00 PM Central on the Monday prior to the scheduled release implementation.

7.0 Outstanding Issue Solution

As outlined above, the OIS process may be invoked as follows:

- Category One-Changes, Step 3.3.12

- Category One-New Interfaces, Step 4.2.14

- Category Two-Changes, Step 3.5.6

- Category-Two New Interfaces, Step 4.3.8

- Category One-Changes, Step 3.3.15

- Category One-New Interfaces, Step 4.2.17

- Retirement of Interfaces, Section 5.2.5

7.1 Process Initiation

The initiating CLEC will provide its SWBT Account Manager with written notification (via fax, email, or regular mail) of the outstanding issue(s). This notice will include the disputing party's reason(s) for raising the dispute and any alternative recommendations. The CLEC initiating an OIS shall provide a bridge number for the conference call with its initiation notice. In the event more than one CLEC initiates an OIS, SWBT shall coordinate with the initiating CLECs to determine which bridge number to use.

7.2 Issue Timeline

In accordance with the appropriate timelines as set out in the above sections of this document, SWBT will publish a summary of all CLEC dispute(s) which will include SWBT's position on those disputes. As soon as reasonably practicable after SWBT's receipt of the OIS initiation notices, but in no event later than one business day before the call, SWBT will notify the CLECs (via email Accessible Letter) that there is a dispute along with the date, time and bridge for the voting call.

All parties agree that it is in their mutual interest to expedite the deliverables that are due during the OIS process.

7.3 Dispute Vote

If the parties are unable to reach a solution, a dispute vote may be called by a quorum of qualified CLECs. Discussion on the voting call may include:

- a dialogue for the opposing views

- impacts of a "No" vote on the remainder of the release or other connected releases (applies to changes to existing interfaces only)

- discussion of options

The vote by qualified CLECs during the call will resolve the question appropriate to the change category (e.g., change to existing interface, introduction of new interface or retirement of interface) as follows:

7.3.1 **Change to Existing Interfaces**: Will SWBT implement the disputed item as defined by SWBT at the end of the notice and comment period (published in the Final Release Requirements)? The allowed votes are "Yes," "No" and "Abstain".

7.3.2 **New Interfaces**: Will SWBT implement the new interface as defined by SWBT at the end of the notice and comment period (published in the Final Release Requirements)? The allowed votes are "Yes," "No" and "Abstain".

7.3.3 **Retirement of Interfaces**: Has SWBT provided comparable functionality? The allowed votes are "Yes," "No" and "Abstain".

In the event of a "yes" vote (allowing SWBT to retire the interface in the timeframe SWBT defined), CLECs who have an interest in continuing to use the retiring interface, beyond the retirement date, should initiate two-party negotiations with SWBT. These negotiations will include, but will not be limited to, discussions of the ongoing costs of maintaining a customized interface and its ultimate obsolescence. The OIS process does not apply in this instance.

7.4   QUALIFIED CLECs

7.4.1 **Final Release Requirements**: If the OIS relates to Final Release Requirements, qualified CLECs must meet the following criteria to participate in a dispute vote:

A. **For New Interfaces**

CLECs with a documented intent to implement the initial version of the new interface within six months of SWBT's planned implementation are considered qualified. Documented intent is further defined as:

- either a CLEC with a signed Interconnection Agreement ("ICA"), with an implementation schedule for the interface, or

- one with a ROU/Memorandum of Understanding ("MOU"), or

- one who is negotiating terms and conditions for access to the interface, subject to acceptable substantiation and sanctioned by a majority vote of the other qualified CLECs.

B. **For Changes to Existing Interfaces**

- CLECs must be in production and be providing service to paying customers (i.e., customers other than employees and/or "friendlies")

- CLECs with a documented intent (as described above) to implement the interface within one month of the scheduled release date, including providing service to paying customers (i.e., customers other than employees and/or "friendlies").

- In the case of an OIS relating to Final Release Requirements, both LEX and EDI users meeting the above criteria are qualified to vote on LSOR changes.

7.4.2 Implementation of Gateway Release

If the OIS relates to implementation of a release, qualified CLECs must meet the following criteria to participate in a dispute vote:

- CLECs must be in production and be providing service to paying customers (i.e., customers other than employees and/or "friendlies")

- CLECs with a documented intent (as described above) to implement the interface within one month of the scheduled release date, including providing service to paying customers (i.e., customers other than employees and/or "friendlies").

- If the OIS call is to discuss implementation of a versioned release, CLEC must be testing release requirements for the newest version.

- Category Two users do not vote in an OIS relating to implementation of a gateway release.

7.4.3 Retirement of Interfaces

If the OIS relates to the retirement of an interface, qualified CLECs must meet the following criteria to participate in a dispute vote:

- CLECs who are currently live production users of the retiring interface.

- SWBT is qualified to vote in OIS on retirement of interfaces.

All CLECs, including those not qualified to vote, may participate on the OIS calls.

7.5 Voting Process – If agreement can not be reached, any OIS shall be resolved by a dispute vote.

A 50% quorum of all qualified CLECs (as defined above) is required for a dispute vote to be held. If a quorum is established, a 51% vote of the quorum (i.e., a simple majority vote) is required to change a release requirement, delay

implementation of an EDI release, or delay retirement of an interface. For OIS on Final Release Requirements dealing with LSOR changes, if a 50% quorum is not established, the vote can still be held if a 50% quorum of qualified CLECs utilizing EDI is established. In the event of a tie, or if no quorum is established, then SWBT shall proceed to change, implement, or retire the interface as specified in the Final Release Requirements.

A qualified CLEC may not give its vote (i.e., proxy) to another voting CLEC. However, a qualified CLEC may designate its company representative as it sees fit, provided that it may not designate another CLEC to cast its vote. An independent designee may represent more than one voting CLEC.

A corporation, including all affiliates, is entitled to a single vote, unless the corporation can convince a majority of other qualified CLECs that it has a legitimate need or right for multiple votes.

8.0 Managing the Change Management Process

Scheduled meetings will be held at intervals (at a minimum of once a quarter) agreed upon by SWBT and CLECs to review the CMP and discuss development plans. During these meetings, the parties will review the effectiveness of the CMP and agree upon any changes. During the CMP meetings, SWBT will share with the CLECs a non-binding, 12-Month Development Plan, with scheduled release dates. Prior to the close of the meeting, the location of the next meeting will be announced. To facilitate access to CMP documentation SWBT will maintain CMP information on its CLEC web site. At a minimum, SWBT's CMP web page will contain:

- Current version of the SWBT Competitive Local Exchange Carrier (CLEC) Interface Change Management Process document

- LSR-EDI Joint Release Test Plan Template

- A log of CLEC Change Requests and status as specified in section 8.1 of this CMP.

- References and/or Links to requirements for upcoming releases.

- SWBT's exceptions to the EDI LSOG Mechanization Specifications

SWBT will maintain and distribute at the CMP meetings an Action Item Log containing action items from previous meetings and status. Additionally, during the CMP meetings, SWBT will review status of the CLEC Change Requests. The meetings will include discussions of SWBT's Development Plan, as well as any CLEC suggested development to the SWBT OSS. Minutes will be taken during

the meetings. A draft version of the minutes will be distributed to meeting participants for comments or revisions. Revisions and comments will be incorporated into the final minutes. Comments or revisions not incorporated will be noted in the Accessible Letter distributing the final minutes.

As noted in the "Purpose" paragraph of this document, the parties intend for the CMP to be dynamic in nature. Proposed modifications to the CMP document shall be originated by means of discussion at the regularly scheduled CMP meetings. Any modification agreed upon by group consensus at the CMP meetings will be documented in the Final Meeting Minutes, and then given to a designated drafting team in order to develop final language. The drafting team will bring proposed final language back to the next CMP meeting for overall approval. Once approved by the participants in the CMP meeting, modifications to the CMP document will be documented in the Final Meeting Minutes and then distributed to all participants invited to the CMP meetings, as well as the appropriate regulatory agencies. Such communication will include both a "red-line" copy of the previous CMP document, and a clean version of the new CMP document. Moreover, within seven (7) calendar days of its formal distribution, a copy of the new CMP will be available on SWBT's CLEC web site.

8.1 Change Request Process

CLECs may recommend interface changes for future consideration by submitting a Change Request Form to their SWBT Account Manager. The process and a sample form are included as Appendix G. SWBT will maintain a log of these requests and provide status of each. In making a decision whether to include a CLEC Change Request in requirements, SWBT will consider such factors as feasibility, costs, user benefits and cost reduction.

8.2 Enforcement

A standing agenda item at the CMP meeting will provide an opportunity for SWBT and CLECs to assess the effectiveness of the CMP and the need for any revisions.

Both CLECs and SWBT will use this opportunity to provide feedback of instances of non-compliance and commit to taking the appropriate action(s).

If after using the discussion opportunity of the CMP meetings, there is consensus that the process is no longer working to the mutual benefit of all, the parties will schedule meetings to begin the re-engineering of the process. If there is no consensus, individual parties may approach the appropriate regulatory body after giving notice of its intent to do so at a CMP meeting. The party will also describe the action it intends to take and the reason(s) for its proposed actions.

If parties believe that non-compliance has been blatant and that the proposed solutions offered by the offending party(ies) is (are) unacceptable, both SWBT and individual CLECs are free to pursue available legal remedies.